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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No. CR24-00557 MAG
)	
Plaintiff,)	AFFIDAVIT OF MICHAEL G. LAGRAMA IN
)	SUPPORT OF REQUEST FOR SUMMONS
v.)	
)	
NICOLAS L. BUNAND,)	
)	
Defendant.)	

1 I, Michael G. Lagrama, depose and state:

2 1. I am an Assistant United States Attorney for the Northern District of California, and I am
3 assigned to the prosecution of the above-captioned case. I received the following information from oral
4 and written reports, and other records, provided to me by the Department of Defense (“DOD”) Police
5 and San Francisco Police Department (“SFPD”).

6 2. On Sunday, March 24, 2024, at approximately 6:30 p.m., a DOD Police Lieutenant was
7 on a regular security patrol in the United States Navy owned section of the Hunters Point Naval
8 Shipyard (“HPNS”) and observed that a padlock had been removed at the entrance of Building 251.
9 Upon entering the building to investigate, the DOD Lt. saw Nicolas Bunand and a second person
10 removing copper wire from the building. After ordering Bunand and his associate to stop and get on the
11 ground, the two ran away and escaped.

12 3. The following morning, March 25, 2024, at approximately 6:00 a.m., the DOD Lt. again
13 saw Bunand and his associate within the Navy owned area of HPNS, this time pushing a cart full of
14 copper wiring. The DOD Lt. ordered them to stop, but the two once again ran away and escaped. The
15 DOD Lt. then called SFPD for backup.

16 4. Two SFPD officers responded to the call at approximately 6:30 a.m. and upon arriving on
17 scene, the officers observed Bunand his associate walking within the restricted, Navy owned area of
18 HPNS.

19 5. The officers attempted to contact Bunand and his associate, and the two ran away from
20 the officers toward the bay and jumped into the water. The officers pursued the two, who began
21 swimming in opposite directions as the officers ordered them to get out of the water. After several
22 minutes of swimming, Bunand emerged from the water and began running away. The officers then
23 chased, apprehended, and detained Bunand, although his associate escaped.

24 6. A San Francisco Fire Department medical unit arrived on scene to treat Bunand for
25 potential hypothermia, and as he was being evaluated in the ambulance, the DOD Lt. identified Bunand
26 as one of the two suspects he had pursued the previous night and again that morning.

27 7. Based on the foregoing facts, there is probable cause to believe that NICOLAS
28 BUNAND has violated 18 U.S.C. § 1382 – Trespass on Military Property, a Class B Misdemeanor, and

1 18 U.S.C. § 13, assimilating California Penal Code § 148(a)(1) – Resisting Arrest, a Class A
2 Misdemeanor.

3 I declare under penalty of perjury that the foregoing is true and correct to the best of my
4 knowledge and belief. Executed October 24, 2024, in San Francisco, California.

5
6 /s/ Michael G. Lagrama
7 MICHAEL G. LAGRAMA
8 Assistant United States Attorney
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